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Attorneys for Plaintiff Zhang Ziyi

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

ZHANG ZIYI, an individual,

Plaintiff,

v.

CHINA FREE PRESS, INC., a North
Carolina non-profit corporation doing
business as BOXUN NEWS; WEICAN
NULL MENG, an individual also known
as WATSON MENG and also known as
WEICAN “WATSON” MENG; DOES 1-
25, inclusive,

Defendants.

CASE NO.: 2:12-cv-05216-DMG
(PLAx)

**SECOND STIPULATION TO
FURTHER CONTINUE HEARING
ON MOTIONS FILED BY
DEFENDANT WEICAN NULL
“WATSON” MENG AND
CONTINUE HEARING ON
MOTION FILED BY CHINA FREE
PRESS, INC.**

1 This Stipulation is by and between Plaintiff Zhang Ziyi ("Plaintiff"), on the one
2 hand, and Defendants Weican Null Meng ("Meng") and China Free Press, Inc.
3 ("CFP"), on the other hand. Plaintiff, Meng and CFP are referred to collectively as
4 the Parties. This stipulation is made with reference to the following facts:

5 RECITALS

6 1. On or about August 15, 2012, Meng filed Defendant Weican Null
7 "Watson" Meng's Motion to Dismiss Complaint for Lack of Personal Jurisdiction
8 Pursuant to 12(b)(2) ("Motion to Dismiss");

9 2. On or about August 16, 2012, the Court scheduled the hearing on
10 Meng's Motion to Dismiss for September 21, 2012, at 9:30am;

11 3. On or about August 18, 2012, Meng filed Defendant Weican Null
12 Meng's Special Motion to Strike Under California Civil Procedure § 425.16 ("Meng's
13 Motion to Strike");

14 4. On or about August 20, 2012, Meng filed Defendant Weican Null
15 Meng's Notice of Special Motion to Strike Under California Civil Procedure § 425.16
16 scheduling the hearing on his Motion to Strike for September 21, 2012, at 9:30am;

17 5. On or about August 31, 2012, Plaintiff and Meng filed a Stipulation to
18 Continue Hearing on Motions Filed by Defendant Weican Null "Watson" Meng
19 requesting that the hearing on Meng's Motion to Dismiss and Motion to Strike be
20 continued to October 12, 2012, so that Plaintiff could conduct discovery for purposes
21 of opposing the two motions;

22 6. On or about September 4, 2012, the Court entered an Order re
23 Stipulation to Continue Hearing on Motions Filed by Defendant Watson Meng
24 continuing the hearing on Meng's two Motions to October 12, 2012, and also
25 continuing the Scheduling Conference to October 12, 2012 as well;

26 7. On or about September 7, 2012, CFP filed a Special Motion of China
27 Free Press to Strike Plaintiff's Complaint ("CFP's Motion to Strike"), which was set
28 for hearing on October 12, 2012;

8. On or about September 7, 2012, Plaintiff noticed the depositions of Meng and Meng's expert witness (Mary Hausch) for September 13, 2012. Counsel for CFP informed counsel for Plaintiff and Meng that he was not available for the depositions as noticed, and he asked that the depositions be rescheduled;

9. Counsel for parties have now met and conferred and agreed to further continue the date for the hearing on Meng's Motion to Dismiss and Meng's Motion to Strike and continue the hearing date on CFP's Motion to Strike to November 16, 2012, to give Plaintiff time to conduct discovery relevant to the motions, including, without limitation, the depositions of Meng, Meng's expert witness (Mary Hausch), and CFP board member Michael Goettig for purposes of opposing the three Motions. The scope of the discovery (including accompanying requests for production of documents), will be limited to issues related to Meng's Motion to Dismiss, Meng's Motion to Strike and CFP's Motion to Strike.

STIPULATION

Based on the above facts, the Parties hereby stipulate, agree and ask the Court to order as follows:

1. The hearing on Meng's Motion to Dismiss, Meng's Motion to Strike and on CFP's Motion to Strike shall be continued until November 16, 2012, at 9:30am.

DATED: September 14, 2012

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By: /s/ Adam LeBerthon

JOHN MASON
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ADAM LEBERTHON
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DATED: September 14, 2012

RANDAZZA LEGAL GROUP

By: /s/ Marc J. Randazza

MARC J. RANDAZZA

JASON A. FISCHER

Attorneys for Defendant Weican Null Meng

DATED: September 14, 2012

DAVID WRIGHT TREMAINE LLP

By: /s/ James Rosenfeld

JAMES ROSENFELD

LORING ROSE

Attorneys for Defendant

China Free Press, Inc.